

ETHYL PETROLEUM ADDITIVES DIVISION



15665 7

INTER-OFFICE

To L. R. BRIGGS ADDRESS

FROM J. L. SPARKS ADDRESS

SUBJECT PLANT CONSTRUCTION-EXCEPTIONS DATE June 25, 1985
TO NO DIG ORDER IN PLANT

This is in response to your June 21, 1985, memo concerning my memo of June 19, 1985. You are correct in that the expansion of NC Warehouse cannot proceed at this point. However, as you know, we have been working towards obtaining this approval and do expect to receive approval to proceed. The problem is that the Agency moves very slowly and ties approval of projects such as "NC" with conditions that hamper the approval process.

In your memo you also mentioned Unit 275 and the North area of the plant where specialty reaction units are being considered and that since this area of the plant is "undetermined", we have effectively shut down your future projects. This is not correct. As early as the Fall of 1984, it was apparent from discussions with the Agency that the plant must, and did in fact adopt a philosophy that all projects would be treated on a case by case basis and approval to proceed with those projects would be sought. This is the plan that was followed for the numerous projects planned for the Southern portion of the plant.

Concerning projects planned for Unit 275 and the Northern portion of the plant, while I have heard rumors/comments to this affect, no one has made me aware of specific sites where construction projects are planned. If this information were available, I could proceed to obtain approval for such projects. It would involve sampling at that specific site and, depending on the results, a plan would be formulated and, if necessary, approved by the E.P.A.

Concerning your question "What can be done to straighten out the mess?", simply identify future projects with specific locations and a description of the work planned for that area and I will obtain approval to proceed.

A handwritten signature in cursive script that reads "J L Sparks".

J. L. Sparks

JLS:dj

cc: S. McWilliams
H.F. Mason
M.J. Bonaventure
R.A. Phillips
J.C. Parks
J.A. Schultz
H.P. Pfister